



JANUS SPECTRUM, LLC

OBSERVING THE PAST TO OPTIMIZE THE FUTURE IN SPECTRUM

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January 3, 2015

Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re. WP Docket 14-235, Request of Engineers Frequency Advisory Committee, LLC,  
("EFAC") to be Certified as a Part 90 Frequency Coordinator

Janus Spectrum, LLC ("Janus") is pleased to submit its comments in support of the request of EFAC to become a Part 90 Frequency Coordinator.

Standing on its own, the composition of EFAC's organizational body clearly shows it is well-suited for the task of frequency coordination. EFAC's engineering arm is TUSA Consulting Services; EFAC's operational planning arm is Blue Wing, Inc. and EFAC's legal and compliance arm is Shulman Rogers Gandal Pordy & Ecker, P.A., all of which have rendered quality support dozens of times on behalf of 800 MHz applicants for 47CFR Part 90 Public Land Mobile Radio filings. Moreover, EFAC is further bolstered by a galaxy of subject matter experts involved in public safety radio communications. Close examination of the background and daily services rendered by TUSA, Blue Wing and Shulman Rogers reveals that they are heavily involved in and have several projects related to FCC Part 90 activities to include interference analysis, scrutiny of Public Notices and license applications/amendments sought by public safety organizations. Collectively, as EFAC, they represent a refreshing and alternate option for both private and public safety organizations to secure frequency coordination, frequency analysis and Form 601 submission services.

EFAC surpasses the four primary criteria set forth by the Commission to qualify as a Private Land Mobile Radio frequency coordination entity. 1. EFAC has nationwide frequency coordination capability and has performed such functions for many public safety organizations and others, 2. EFAC operates in an unbiased manner in its coordination planning, 3. EFAC has representativeness of the users of Part 90 frequencies to include counties and municipalities in Georgia, Florida and elsewhere

and 4. EFAC has plenty of previous experience coordinating frequencies as evidenced by the hundreds of public safety entities and other entities which have successfully been awarded operating permits and modifications of existing permits.

In summary, Janus Spectrum believes that the Commission, in the interest of fairness and in the interest of decreasing the number of application process bottlenecks, should hastily welcome and approve a well-qualified addition to the coordination community such as EFAC.

If there are any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Alcorn', is written over a horizontal line.

David Alcorn  
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